

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION**

No. 3:23-md-03084-CRB

**SUPPLEMENTAL DECLARATION OF  
ROOPAL P. LUHANA IN SUPPORT OF  
PLAINTIFFS' MOTION TO ENFORCE  
PTO NO. 2 AND TO COMPEL  
DEFENDANTS TO PRODUCE  
LITIGATION HOLD AND  
PRESERVATION INFORMATION**

This Document Relates to:  
  
All Cases

Judge: Honorable Lisa J. Cisneros  
Date: January 8, 2024  
Time: 12:30 PM  
Courtroom: 6 – 17th Floor (by Zoom)

I, Roopal P. Luhana, declare and state as follows:

1. I am an attorney and partner at Chaffin Luhana LLP, counsel for Plaintiffs and Court-appointed Co-Lead Counsel in this action. I am a member in good standing of the State Bars of New York, New Jersey, and Pennsylvania, and am admitted *pro hac vice* in this coordinated action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this Supplemental Declaration in support of Plaintiffs' Motion to Enforce PTO No. 2 and to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively "Uber") to produce litigation hold and preservation information.

3. On January 4, 2024, Uber produced a list of the job titles of past and current Uber employees subject to a legal hold.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 8, 2024, in New York, New York.

/s/ Roopal P. Luhana  
Roopal P. Luhana